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Attorneys for Plaintiff Water Street Gaming LLC

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

WATER STREET GAMING LLC, d/b/a
Rainbow Club.

Plaintiff,

v.

CULINARY WORKERS UNION
LOCAL 226,

Defendant.

Case No. 2:24-cv-00297

**STIPULATION FOR EXTENSION
OF TIME FOR DEFENDANT TO
RESPOND TO THE COMPLAINT
PURSUANT TO CIVIL LOCAL
RULE IA 6-1(a)**

(Third Request)

Plaintiff Water Street Gaming LLC d/b/a Rainbow Club (“Rainbow Club”) and Defendant
Culinary Workers Union Local 226 (“Local 226”), by and through their respective attorneys of

1 record herein, and without waiving any rights, claims, or defenses they have in this action, enter
2 into this Stipulation pursuant to Civil Local Rule 6-1(a) as follows:

3 WHEREAS, Rainbow Club filed its Amended Complaint on February 13, 2024, ECF No.
4 2;

5 WHEREAS, on February 16, 2024, Rainbow Club served its Amended Complaint;

6 WHEREAS, on March 8, 2024, the Court granted the Parties' Stipulation for Extension
7 of Time for Defendant to respond to the Amended Complaint to April 5, 2024, ECF No. 8;

8 WHEREAS, on April 10, 2024 the Court granted the Parties' Second Stipulation for
9 Extension of time for Defendant to respond to the Amended Complaint to May 6, 2024, ECF No.
10 12;

11 WHEREAS, the Parties continue to be engaged in substantive settlement discussions and
12 have made significant progress;

13 WHEREAS, in order to see whether the case can be resolved without further involvement
14 of the Court, Plaintiffs have agreed to give Defendant an extension of time to respond to the
15 Complaint of up to and including May 13, 2024;

16 WHEREAS, the Parties believe that these circumstances constitute good cause for
17 granting a third extension of time to respond because it will conserve judicial and party resources
18 if the Parties can resolve the case without further Court involvement;

19 WHEREAS, such an extension will not alter any event or deadline already fixed by Court
20 order.

21 NOW, THEREFORE, the Parties, through their undersigned counsel, hereby stipulate that
22 Local 226 will respond to the Amended Complaint on or before May 13, 2024.

23 IT IS SO STIPULATED.

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1 MCCRACKEN, STEMERMAN &
2 HOLSBERY, LLP

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3 By: /s/Sarah Grossman-Swenson
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10 IT IS SO ORDERED.

11
12 Dated: 5/7/2024


13 UNITED STATES MAGISTRATE JUDGE

PROOF OF SERVICE

I hereby certify that on the 3rd day of May, 2024, I served a true and correct copy of the foregoing document:

**STIPULATION FOR EXTENSION OF TIME FOR DEFENDANT TO
RESPOND TO THE COMPLAINT PURSUANT TO CIVIL LOCAL RULE
IA 6-1(a) (Third Request)**

Via electronic filing and electronic mail, addressed as follows:

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I declare under penalty of perjury that the foregoing is true and correct.


Katherine Pierre